

Inner City Press

March 24, 2021

By E-mail to BroderickNYSDChambers@nysd.uscourts.gov

Hon. Vernon S. Broderick, United States District Judge
Southern District of New York, 500 Pearl Street New York, NY 10007

Re: Press Access to improperly redacted documents & exhibits in US v. Ashe/Hong Piao, 15-cr-706

Dear Judge Broderick:

This concerns, in the above-captioned criminal case, to the withholding proposed this evening by Heidi Hong Piao, who pleaded guilty to her role in United Nations bribery, of her "statement of the case" and other information relied on by the Court in granting her a time served sentence.

These are clearly judicial documents. And there is a public interest in UN corruption, and in cleaning it up.

That the Government, according to the March 24 submission (Docket 997) "does not object" to withholding this information from the Press and public is of no import to the legal analysis.

Covering the Ashe / Ng Lap Seng trial for Inner City Press, I emailed the US Attorney's Office Press Office repeatedly for exhibits, and was not provided with them. Nor have they been provided despite Inner City Press' FOIA request. Compare, Judge Jed S. Rakoff's request ruling on Inner City Press' request in US v. Weigand, viewable here: <https://www.documentcloud.org/documents/20513316-icpunsealweigandjsrorder>

Again, these are, needless to say, judicial documents within the mention of *United States v. Aref*, 533 F.3d 72, 81-83 (2d Cir. 2008) and *Lugosch v. Pyramid Co.*, 435 F.3d 110 (2d Cir. 2006) - they should be made available.

Please confirm receipt of and docket this application, and thank you for your attention to it.

Respectfully submitted,

Matthew Russell Lee, Inner City Press

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